

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: WILLIAM G. SCHWARTZ : CHAPTER 7  
DEBTOR : BKY NO. 18-14650**

**TRUSTEE'S MOTION FOR LEAVE TO SELL DEBTOR'S REAL ESTATE AT  
PRIVATE SALE FREE AND CLEAR OF LIENS**

TO THE HONORABLE ASHELY M. CHAN BANKRUPTCY JUDGE:

And Now Comes Michael H. Kaliner, Trustee, and respectfully files this Motion and in support thereof represents as follows:

1. The Movant is Michael H. Kaliner, the duly appointed Trustee herein.
2. The Debtor with his non-Debtor spouse owns the real estate located at 1000 Horseshoe Pike, Downingtown, PA 19355 (hereinafter referred to as "the real estate").
3. The Trustee has received an offer to purchase the real estate from The Wood Shop LLC for the sum of \$450,000.00 in accordance with the Agreement of Sale which is attached hereto and incorporated herein as Exhibit "A."
4. There are mortgages recorded against the real estate in favor of Coatesville Savings Bank and the Estate of George X. Schwartz, which have outstanding balances of approximately \$97,759.00 and \$177,942.87, respectively.
5. The Internal Revenue Service and the Commonwealth of PA have filed tax liens against the Debtor, which will be paid in the order of priority to the extent of the remaining portion of the Debtor's 50% share of the real estate as well as from the Debtor's share of his inheritance from the Estate of George X. Schwartz.
6. The Trustee proposes to pay at closing 6% real estate commission, all real estate and transfer taxes and other ordinary settlement costs, the mortgages of Coatesville Savings Bank and The Estate of George X. Schwartz, any joint tax liens to the extent of available proceeds and 50% of the net proceeds, if any, to Jacqueline R. Schwartz.
7. This is the best offer which the Trustee has received.
8. The sale is fair and reasonable and in the best interest of the Estate.

**WHEREFORE**, the Trustee respectfully requests that this Honorable Court grant the relief requested.

/s/Michael H. Kaliner  
Michael H. Kaliner, Trustee  
**Adelstein & Kaliner, LLC**  
350 S. Main Street Suite 105  
Doylestown, PA 18901